

WEIL, GOTSHAL & MANGES LLP
Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**REORGANIZED DEBTORS' REPORT
ON RESPONSES TO THIRTEENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (CLAIMS BARRED BY
THE STATUTE OF REPOSE) AND
REQUEST FOR ORDER BY DEFAULT
AS TO UNOPPOSED OBJECTIONS**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

[Re: Dkt. No. 11085]

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

**Resolving Objections Set for Hearing
September 29, 2021 at 10:00 a.m. (Pacific
Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that
8 the Court enter an order by default on the *Reorganized Debtors’ Thirteenth Securities Claims Omnibus*
9 *Objection (Claims Barred by the Statute of Repose)* [Docket No. 11085] (the “**Thirteenth Securities**
10 **Claims Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE THIRTEENTH SECURITIES CLAIMS OMNIBUS**

12 **OBJECTION**

13 The Thirteenth Securities Claims Omnibus Objection seeks to disallow and expunge proofs of
14 claim that were filed by PG&E security holders whose claims are based exclusively on transactions in
15 debt securities that were offered more than three years before the Petition Date and are thereby barred
16 by the three-year statute of repose for claims arising under Section 11 of the Securities Act. These claims
17 are listed in Exhibit 1 to the Thirteenth Securities Claims Omnibus Objection.

18 **NOTICE AND SERVICE**

19 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Thirteenth*
20 *Securities Claims Omnibus Objection (Claims Barred by the Statute of Repose)* [Docket No. 11088] (the
21 “**Notice of Hearing**”). The Thirteenth Securities Claims Omnibus Objection was supported by the
22 *Declaration of Edward J. Radetich, Jr. in Support of Reorganized Debtors’ Thirteenth Securities Claims*
23 *Omnibus Objection (Claims Barred by the Statute of Repose)* [Docket No. 11086] (the “**Radetich**
24 **Declaration**”). The Thirteenth Securities Claims Omnibus Objection was also supported by the
25 *Declaration of Michael A. Keable in Support of Reorganized Debtors’ Thirteenth Securities Claims*
26 *Omnibus Objection (Claims Barred by the Statute of Repose)* [Docket No. 11087] (the “**Keable**
27 **Declaration**”). The Thirteenth Securities Claims Omnibus Objection, the Notice of Hearing, the
28 Radetich Declaration, and the Keable Declaration were served as described in the *Certificate of Service*

of Victor Wong, filed on August 24, 2021 [Docket No. 11140] (the “**Certificate of Service**”). As further described in the Certificate of Service, on August 18, 2021, each holder of a claim listed on Exhibit 1 to the Thirteenth Securities Claims Omnibus Objection received a notice including the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Thirteenth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following responses:

Docket No.	Claimant	Claim Nos.	Resolution
11260	AmeriTrust Claimants	107040, 107038, 107039, 104331	The objection to these claims has been continued to the November 9, 2021, Omnibus Hearing and these claims have been removed from Exhibit A to this Request.
11277	Commonwealth Annuity and Life Insurance Company	100939	The objection to this claim has been continued to the November 9, 2021, Omnibus Hearing and this claim has been removed from Exhibit A to this Request based on claimant’s late-filed response.
Informal	William Mayer	98261	The objection to this claim has been continued to the November 9, 2021, Omnibus Hearing and this claim has been removed from Exhibit A to this Request.
11246	Thomas A. Mullady	97910	The objection to this claim has been continued to the November 9, 2021, Omnibus Hearing and this claim has been removed from Exhibit A to this Request.
Informal	Larry and Paulette Siedow	97946	The objection to this claim has been continued to the November 9, 2021, Omnibus Hearing and this claim has been removed from Exhibit A to this Request.
Informal	Donald S. Terra	98875	The objection to this claim has been continued to the November 9, 2021, Omnibus Hearing and this claim has been removed from Exhibit A to this Request.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a partner with the law firm of Weil, Gotshal & Manges LLP (“**Weil**”), counsel for the Reorganized Debtors.

2. The Court's docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Thirteenth Securities Claims Omnibus Objection except as described herein.

WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and expunging the proofs of claim listed in the column headed “Claims to be Disallowed/Expunged” in **Exhibit A** to this Request, which listed claims identical to those in Exhibit 1 to the Thirteenth Securities Claims Omnibus Objection, except as otherwise discussed above.

Dated September 22, 2021

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack

Richard W. Slack

Attorneys for Debtors and Reorganized Debtors